

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROBERT E. MORLEY, JR., et al.

Plaintiffs,

v.

SQUARE, INC., et al.,

Defendant.

SQUARE, INC., et al.,

Plaintiffs,

v.

REM HOLDINGS 3, LLC,

Defendant.

Case No. 4:14-cv-00172 -SNLJ

**Case No. 4:10-cv-02243-SNLJ
CONSOLIDATED**

**PLAINTIFFS' MOTION REQUESTING THE COURT TO ORDER DEFENSE
COUNSEL TO ADHERE TO STANDARDS OF PROFESSIONAL CONDUCT AND TO
CEASE VEXATIOUS LITIGATION CONDUCT**

For the reasons stated in the accompanying memorandum of law, Plaintiffs Robert E. Morley, Jr. and REM Holdings 3, LLC's (collectively "Plaintiffs" or "Dr. Morley") request the Court order counsel for Defendants Square, Inc., Jack Dorsey, and James McKelvey, Jr. (collectively "Defendants" or "Square") to adhere to standards of professional conduct and to cease vexatious litigation conduct. Following many efforts to resolve this issue without Court intervention, Plaintiffs now seek the Court's assistance.

DATED: August 16, 2015

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFFS

ROBERT E. MORLEY, JR. AND

REM HOLDINGS 3, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on August 16, 2015, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ John Austin Curry
Austin Curry